

**CERTIFICATE OF WORD COUNT/PAGE COUNT AND
WORD/PAGE LIMITATION COMPLIANCE**

The undersigned certifies, as per Supreme Court Rule(s) 23, 33.1(d) and (h), 33.2(b), and/or 37.4, as appropriate, that the length of the accompanying Brief of *Amicus Curiae* David Boyle in Support of No Party in 26A305, including the words on the second-last page (except for an exempt-matter page, see below) of the brief, “September 9, 2026” and “Respectfully submitted”, but exclusive of “exempt” sections under Rule 33.1(d) including the listing of counsel at the end, is 1385 words, since his word-processing program states the word count is 1385 words. As for page count, the count is 5 pages, in that the 6th page consists of exempt matter (listing of counsel). Thank you for your time.

September 9, 2026

Respectfully submitted,

David Boyle
Counsel of Record
P.O. Box 15143
Long Beach, CA 90815
dbo@boyleslaw.org
(734) 904-6132